

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BATTAT INCORPORATED,

Plaintiff and Counterclaim-
Defendant,

v.

LAKESHORE EQUIPMENT CO., d/b/a
LAKESHORE LEARNING MATERIALS,

Defendant and Counterclaim-
Plaintiff.

CASE NO. 08 CIV 6408 RMB

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

AUG 21 2008

PLEASE TAKE NOTICE that upon the Declaration of Jane G. Stevens dated August 20, 2008, the accompanying Declaration of Karin G. Pagnanelli dated August 18, 2008, and the exhibit annexed thereto, the undersigned moves this Court for an Order, pursuant to Rule 1.3(c) of the Local Rules for the United States District Court for the Southern District and Eastern Districts of New York, admitting Karin G. Pagnanelli to the Bar of this Court *pro hac vice* to appear and participate as counsel for Defendant and Counterclaim-Plaintiff Lakeshore Equipment Co., d/b/a Lakeshore Learning Materials in the above-captioned action.

DATED: New York, New York
August 20, 2008

MITCHELL SILBERBERG & KNUPP LLP

By:



Jane G. Stevens (JS 5869)
Paul V. LiCalsi (PL 6622)
12 East 49th Street, 30th Floor
New York, New York 10017
Telephone: (212) 509-3900
Facsimile: (917) 546-7677

-and-

Karin G. Pagnanelli
Betsy A. Zedek
11377 West Olympic Boulevard
Los Angeles, California 90064
Telephone: (310) 312-2000
Facsimile: (310) 312-3100
*Attorneys for Defendant and Counterclaim-
Plaintiff*
*Lakeshore Equipment Co., d/b/a Lakeshore
Learning Materials*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LAKESHORE EQUIPMENT CO., d/b/a
LAKESHORE LEARNING MATERIALS,

Defendant and Counterclaim-
Plaintiff.

CASE NO. 08 CIV 6408 RMB

**DECLARATION OF JANE G. STEVENS
IN SUPPORT OF MOTION FOR
ADMISSION OF KARIN G. PAGNANELLI
PRO HAC VICE**

JANE G. STEVENS, declares under the penalties of perjury as follows:

1. I am a partner, through my professional corporation, of the law firm Mitchell Silberberg & Knupp LLP, counsel for Defendant and Counterclaim-Plaintiff Lakeshore Equipment Co., d/b/a Lakeshore Learning Materials ("Lakeshore") in the above-captioned action. I submit this declaration in support of the motion, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Courts for Southern and Eastern Districts of New York, for an order granting Karin G. Pagnanelli, Esq., admission to the Bar of this Court *pro hac vice* for the purpose of allowing her to participate in the representation of Lakeshore in the above-captioned matter, and to appear before this Court.

2. I am a member in good standing of the Bar of this Court.

3. I have reviewed the Declaration of Karin G. Pagnanelli in support of the Motion for Admission *Pro Hac Vice* submitted herewith, and I believe that the Declaration is true and correct.

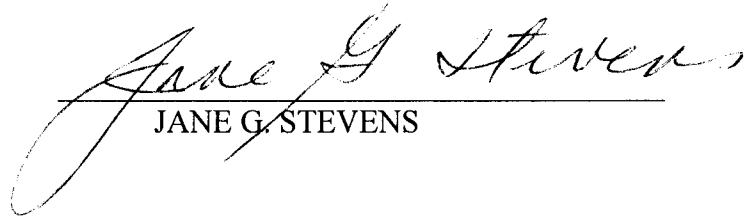
4. Ms. Pagnanelli is a partner, through her professional corporation, of Mitchell Silberberg & Knupp LLP, located at 11377 West Olympic Boulevard, Los Angeles, CA 90064. She is experienced and familiar with the matter which is pending before this Court.

5. No previous application has been made for the relief requested herein.

6. Accordingly, I respectfully request that Karin G. Pagnanelli be admitted to the Bar of this Court *pro hac vice*.

7. Pursuant to 28 U.S.C. § 1746 , I declare, under penalty of perjury under the laws of the United States, that the foregoing statements are true and correct.

Executed on August 20, 2008


JANE G. STEVENS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BATTAT INCORPORATED,

Plaintiff and Counterclaim-
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v.

LAKESHORE EQUIPMENT CO., d/b/a
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Defendant and Counterclaim-
Plaintiff.

CASE NO. 08 CIV 6408 RMB

**DECLARATION OF KARIN G.
PAGNANELLI IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE***

KARIN G. PAGNANELLI, applicant herein for admission *pro hac vice*, declares under the penalties of perjury as follows:

1. My professional corporation is a partner of the law firm Mitchell Silberberg & Knupp LLP, 11377 West Olympic Boulevard, Los Angeles, CA 90064.
2. I submit this Declaration in support of the motion, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, for an Order granting applicant admission *pro hac vice* to the Bar of the United States District Court for the Southern District of New York to appear and participate as counsel for Defendant and Counterclaim-Plaintiff Lakeshore Equipment Co., d/b/a Lakeshore Learning Materials ("Lakeshore") in the above-captioned action.
3. As demonstrated by the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California. I am also a member in good standing of the Bars for the United States District Courts for the Central, Eastern, Northern, and

Southern Districts of California, for the United States Courts of Appeal for the First, Seventh, and Ninth Circuits, and for the Supreme Court of the United States.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.

WHEREFORE, your applicant respectfully requests to be admitted to practice before this Court *pro hac vice* in the above-captioned matter on behalf of Lakeshore.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2008


KARIN G. PAGNANELLI



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

August 15, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KARIN PAGNANELLI, #174763 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1994; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

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CASE NO. 08 CIV 6408 RMB

**ORDER FOR ADMISSION *PRO HAC VICE*
ON WRITTEN MOTION**

Upon the motion of Jane G. Stevens, attorney for Defendant and Counterclaim-Plaintiff Lakeshore Equipment Co., d/b/a Lakeshore Learning Materials ("Lakeshore") in the above-captioned action, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Karin G. Pagnanelli, Esq.
Mitchell Silberberg & Knupp LLP
11377 W. Olympic Blvd.
Los Angeles, CA 90064
Tel: 310-312-3746
Fax: 310-312-3786
Email: kgp@msk.com

is admitted to practice pro hac vice as counsel for Lakeshore in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2008
New York, New York

Honorable Richard M. Berman
United States District Court Judge

AFFIDAVIT OF SERVICE

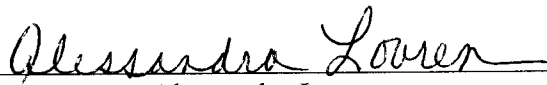
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Alessandra Lovren, being duly sworn, deposes and says:

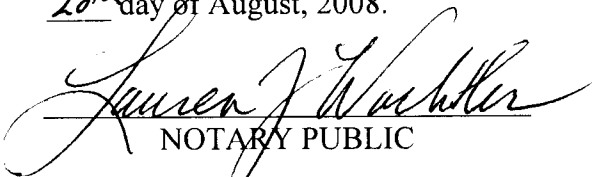
1. I am not a party to this action, am over the age of 18 and reside at 6106 Highland Place, West New York, NJ 07093.

2. On August 20, 2008, I served a copy of a Notice of Motion to Admit Counsel *Pro Hac Vice*, Declaration of Jane G. Stevens in Support of Motion for Admission of Karin G. Pagnanelli *Pro Hac Vice*, Declaration of Karin G. Pagnanelli in Support of Motion for Admission *Pro Hac Vice*, Certificate of Good Standing, and Order for Admission *Pro Hac Vice* on Written Motion by regular mail upon:

Andrew S. Langsam, Esq.
Pryor Cashman LLP
410 Park Avenue, 10th Floor
New York, NY 10022


Alessandra Lovren

Sworn to before me this
20th day of August, 2008.


NOTARY PUBLIC

LAUREN J WACHTLER
Notary Public, State of New York
No. 5011538
Qualified in Westchester County
Term Expires April 19, 199~~9~~ 2011